

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FILED *pw*

UNITED STATES DISTRICT COURT
DISTRICT OF NEW MEXICO

98 MAY 22 AM 8:37

UNITED STATES OF AMERICA,

Plaintiff,

Alberto K. del Rio
CLERK-ALBUQUERQUE

vs.

Case No. CRIM-98-184-M

RICARDO MENDEZ,

Defendant.

MOTION BY DEFENDANT MENDEZ TO ALLOW DEFENDANT MENDEZ
TO TRAVEL TO ELEPHANT BUTTE, NEW MEXICO
FOR MEMORIAL DAY WEEKEND UNDER THE
DIRECT AND CONTINUOUS SUPERVISION OF HIS MOTHER, ELSA DELGADO

COMES NOW Defendant RICARDO MENDEZ, by and through his attorneys, Clear & Clear, P. A., by Thomas J. Clear, III, and hereby respectfully moves This Honorable Court to allow Defendant Mendez to travel with his mother, Elsa Delgado, his sister, Elsa Mendez, and his brother Joseph Mendez to Elephant Butte, New Mexico for the Memorial Day Weekend from Friday, May 22, 1998 at 3:00 p.m. until Monday, May 25 at 8:00 p.m. and as grounds therefore, STATES:

1. At 4:30 p.m. on Thursday, May 21, 1998, counsel for Defendant Mendez contacted Maria Klee, the Pretrial Supervisor for Defendant Mendez, and she indicated that she has no objection whatsoever to the requested relief so long as Defendant

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Mendez is in the continuous direct supervision of his mother, Elsa Delgado.

2. Defendant Mendez will be staying in a room with his mother, Elsa Delgado, at the Elephant Butte Inn, Highway 195, Truth of Consequences, New Mexico 87935, (505) 744-5431.

3. No prejudice will occur to any party as the result of the granting by This Honorable Court of the requested relief.

4. It is in the best interest of the parties that the requested relief be granted.

5. Counsel for Defendant Mendez tried but was unable to contact opposing counsel, Thomas L. English, for his position herein.

Respectfully submitted,

CLEAR & CLEAR, P. A.
Attorneys for Defendant
RICARDO MENDEZ

BY: 
THOMAS J. CLEAR, III
6400 Uptown Blvd. N.E.
Suite 475-W, City Centre
Albuquerque, New Mexico 87110
(505) 883-6944

I hereby certify that a true
and correct endorsed copy of
the foregoing was hand-delivered
to the Office of the United States
Attorney, District of New Mexico,
this 22nd day of May, 1998.


Thomas J. Clear
THOMAS J. CLEAR, III